

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

**GEORGE W. YANNA, JR., and
GLORIA YANNA**

CIVIL ACTION NO.

VERSUS

JUDGE

**STONE ENERGY CORPORATION,
STONE ENERGY OFFSHORE, L.L.C.,
H&H WELL SERVICES, INC., and
WOOD GROUP PSN, INC.**

**MAGISTRATE JUDGE
JURY DEMAND**

ORIGINAL COMPLAINT

NOW INTO COURT, through undersigned counsel, comes Claimants, **George W. Yanna, Jr. and Gloria Yanna**, individuals of the full age of majority and residents of Vermillion Parish and the State of Louisiana, who respectfully allege the following:

1.

Made Defendants herein are:

- A. **Stone Energy Corporation**, a Delaware corporation which may be served through its registered agent for service of process in the State of Louisiana: C T Corporation system, 3867 Plaza Tower Drive, Baton Rouge, LA 70816.
- B. **Stone Energy Offshore, L.L.C.**, a Delaware limited liability company which may be served through its registered agent for service of process in the State of Louisiana: C T Corporation system, 3867 Plaza Tower Drive, Baton Rouge, LA 70816.
- C. **H&H Well Services, Inc.**, a Louisiana corporation which may be served through its registered agent for service of process in the State of Louisiana: Cindy H. Viator, 4006 Third Street, New Iberia, LA 70560.
- D. **Wood Group PSN, Inc.**, a Nevada corporation which may be served through its registered agent for service of process in the State of Louisiana: Corporation Service Company, 501 Louisiana Avenue, Baton Rouge, LA 70802.

2.

Subject matter jurisdiction in this matter is supplied by 28 U.S.C. § 1331 and/or 43 U.S.C. § 1349(b).

3.

At all relevant times, Defendants, **Stone Energy Corporation** and **Stone Energy Offshore, L.L.C.**, owned and operated a fixed platform located in the Mississippi Canyon area of the Gulf of Mexico (hereinafter referred to as “the Platform”).

4.

At all relevant times, Defendants, **Stone Energy Corporation**, **Stone Energy Offshore, L.L.C.**, **H&H Well Services, Inc.** and **Wood Group PSN, Inc.**, were performing work/services onboard the Platform.

5.

On or about August 10, 2015, **George W. Yanna, Jr.** was working onboard the Platform for his employer, Linear Controls, Inc.

6.

On or about August 10, 2015, **George W. Yanna, Jr.** sustained severe and permanently disabling injuries to his body and mind when pressure from piping associated with the Platform released in an uncontrolled manner.

7.

Governmental statutes/regulations pertaining to activities on offshore structures and/or facilities were violated by Defendants, either directly or by those for which Defendants are responsible, such that the Defendants were negligent *per se*.

8.

The incident and **George W. Yanna, Jr.**'s injuries were caused by the negligence and/or fault of the defendants in the following non-exclusive ways:

- A. Failing to properly inspect;
- B. Failing to properly remedy one or more unreasonably dangerous conditions;
- C. Creating and/or permitting the existence of one or more unreasonably dangerous conditions;
- D. Failing to provide a safe place to work;
- E. Failing to do what should have been done so as to avoid the incident set forth herein;
- F. Negligent supervision, hiring, training and/or entrustment;
- G. Failing to comply with duties and responsibilities, whether imposed by contract or law;
- H. Failing to conduct a proper Job Safety Analysis (JSA) or the equivalent;
- I. Failing to comply with applicable government regulations; and/or
- J. Any and all other acts of negligence and/or fault established through discovery and/or shown at the trial of this matter.

9.

Defendants are liable to Plaintiffs under Louisiana Civil Code articles 2315, 2316, 2317, 2317.1, and/or 2322, as well as any other provisions of law(s) deemed to be applicable.

10.

George W. Yanna, Jr. bears no fault whatsoever in causing or contributing to this incident.

11.

As a result of the injuries he sustained in the incident at issue, **George W. Yanna, Jr.** is entitled to recover the following past and future damages:

- A. Physical pain and suffering;
- B. Mental pain and suffering;
- C. Disability, disfigurement and/or loss of enjoyment of life;
- D. Loss of wages, loss of earning capacity, and loss of fringe benefits;
- E. Medical expenses; and
- F. Any and all other general and/or special damages recoverable under the applicable law(s).

12.

At all relevant times herein **George W. Yanna, Jr.** was married to, living with, and supporting claimant, **Gloria Yanna**, thereby entitling **Gloria Yanna** to the following past and future damages sustained as a result of **George W. Yanna, Jr.**'s injuries:

- A. Loss of support, both financial and emotional;
- B. Loss of consortium, love, affection and all other related damages permitted by any applicable law(s);
- C. Loss of nurture, care, guidance, and protection;
- D. Loss of services; and
- E. Any and all other general and/or special damages recoverable under the applicable law(s).

13.

Claimants demand a trial by jury.

WHEREFORE, Claimants, **George W. Yanna, Jr.** and **Gloria Yanna**, pray that Defendants, **Stone Energy Corporation**, **Stone Energy Offshore, L.L.C.**, **H&H Well Services, Inc.**, and **Wood Group PSN, Inc.** each be cited to appear and answer this Complaint within the legal delays allowed by law and that there be judgment in favor of Claimants and against Defendants, jointly, severally, and/or in solido in the full and true sum of an amount of damages, both general and special, as is reasonable in the premises, plus legal interest thereon from the date appropriate under the law until paid, all costs of these proceedings, and all other just and equitable relief to which Claimants are entitled.

Respectfully submitted,

DOMENGEAUX, WRIGHT, ROY
EDWARDS & COLOMB, LLC

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